

1 Richard Bechtolt
2 Law Office Richard Bechtolt
3 W. 1516 Riverside
4 Spokane, Washington 99201
5 Telephone: 509.838.3601
6 Email: richardbechtolt@aol.com
7
8
9

10 UNITED STATES DISTRICT COURT FOR THE
11 EASTERN DISTRICT OF WASHINGTON
12 HONORABLE ROSANNA MALOUF PETERSON

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 vs.
16 TERRY HUNT,
17 Defendant
18

No. 16-207-RMP-1

Motion to Join Motions in Limine
and Motion in Limine

SEPTEMBER 6, 2017 AT 10:00
AM

19
20 TO: Joseph Harrington, Acting United States Attorney

21 Earl A. Hicks, Assistant United States Attorney

22 Terry Hunt, through counsel Richard Bechtolt, moves the Court to join
23 the Motions in Limine filed by co-defendants Russell Hunt and Mary Hunt.
24 Mr. Terry Hunt additionally adds the following Motion in Limine as to Terry
25 Hunt.

Motion to Join Motions in Limine and Motion in Limine

1 Motion to Exclude Testimony of Daniel Hammock

2 Discovery provided by the government includes statements by a
3 Daniel Hammock. Daniel Hammock is alleged to have purchased firearms
4 on at least three occasions for Terry Hunt in the Western District of
5 Washington. See Indictment, Count One (G)(H)and (I). Mr. Hammock was
6 interviewed by ATF agents and provided statements that he filled out ATF
7 form 4473 for purchases of firearms for Terry Hunt.

8 No discovery has been provided that indicates that Mr. Hammock
9 was provided immunity from prosecution or provided an agreement from
10 the government for his cooperation and testimony in this matter. Under the
11 government's theory of the case, Mr. Hammock's statements, if true,
12 constitute a federal firearms crime. Mr. Hammock should be prohibited
13 from testifying unless evidence that he has been advised of his Fifth
14 Amendment Right against Self Incrimination is made part of the record, that
15 he has been provided an attorney to advise him, and/or that if the United
16 States has made any agreement or immunity from prosecution promise,
17 that be provided to counsel.

18 Respectfully Submitted this 16 day of August, 2017

19 s/ Richard Bechtolt
20 WA 11603
21 Attorneys for Hunt
22 Law Offices of Richard Bechtolt
23 W. 1516 Riverside
Spokane, Washington 99201
Telephone: (509) 838.3601
Email: richardbechtolt@aol.com

24 CERTIFICATE OF SERVICE

25 I hereby certify that on this 16 day of August 2017, I electronically
filed the foregoing with the Clerk of the Court using the CM/ECF System

Notice of Appearance

1 which will send notification of such filing to the following: Earl A. Hicks,
2 Assistant United States Attorney.

3
4 s/ Richard Bechtolt
5 WA 11603
6 Attorneys for Hunt
7 Law Offices of Richard Bechtolt
8 W. 1516 Riverside
9 Spokane, Washington 99201
10 Telephone: (509) 838.3601
11 Email: richardbechtolt@aol.com
12
13
14
15
16
17
18
19
20
21
22
23
24
25